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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

CHARM HOSPITALITY LLC d/b/a  
WINGATE BY WYNDHAM ELKO,

Plaintiff,

vs.

NOHAYIA JAVED, ESQ.; and WEST  
TOWN BANK & TRUST; DOES I-X;  
ROE BUSINESS ENTITIES XI-XX,

Defendants.

**CASE NO. 2:25-cv-00282-APG-BNW**

**STIPULATED MOTION TO EXTEND  
DEADLINE TO AMEND PLEADINGS  
AND ADD PARTIES**

(First Request)

Plaintiff, Charm Hospitality LLC d/b/a Wingate by Wyndham Elko, Defendant Nohayia Javed, Esq., and Defendant Capital Bank, fka West Town Bank & Trust, pursuant to Fed. R. Civ. P. 26 and U.S. Dist. Ct. Rules D. Nev. LR IA 6-1, collectively move for an extension of the current deadline to “Amend Pleadings and Add Parties.” The Court’s current scheduling order entered June 4, 2025, [ECF 29], sets the deadline to amend pleadings and add parties for **July 22, 2025**. Javed has a pending Motion to Stay Discovery [ECF 35] that has not yet been ruled upon by the Court. As of today’s date, Javed’s Motion to Dismiss [ECF 17] also remains pending in this case. Javed has not filed an initial pleading and therefore cannot amend any pleading nor add any parties should she need to do so. This is the first request for an extension of deadlines (aside from the pending Motion to Stay Discovery) and is not requested for the purpose of delay. This stipulated Motion is supported by good cause and the Court’s record in this matter.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Legal Authority**

3 A motion or stipulation to extend time must state the reasons for the extension  
4 requested and must inform the court of all previous extensions of the subject deadline the  
5 court granted. LR 6-1. A motion or stipulation to extend any date set by the discovery  
6 plan, scheduling order, or other order must, in addition to satisfying the requirements of  
7 LR 6-1, be supported by a showing of good cause for the extension. LR 26-3. A motion  
8 or stipulation to extend a discovery deadline or to reopen discovery must include: (a) a  
9 statement specifying the discovery completed; (b) a specific description of the discovery  
10 that remains to be completed; (c) the reasons why the deadline was not satisfied or the  
11 remaining discovery was not completed within the time limits set by the discovery plan;  
12 and (d) a proposed schedule for completing all remaining discovery.

13 **II. Discovery Completed**

14 The parties have exchanged Initial Disclosures under Rule 26(f). Plaintiff served  
15 written discovery requests on each Defendant; each Defendant has responded to those  
16 requests.

17 **III. Discovery Remaining**

18 All fact witness depositions and expert disclosures and discovery remain to be  
19 completed per the Court's current scheduling order.

20 **IV. Reasons why the extension is required; no other discovery dates are**  
21 **affected**

22 Defendant Javed has not yet answered the complaint due to her pending motion to  
23 dismiss, and she is therefore unable to complete any amendments to a pleading or add any  
24 parties to this case at this time. Plaintiff and Defendant Capital Bank may need to amend  
25 pleadings or add parties based upon the pleading that may ultimately be filed by Defendant  
26 Javed. The parties agree that a 30-day extension will allow time for further Rule 26(f)  
27 discussion about an appropriate deadline for completing amendments to pleadings and  
28 adding any further parties to the proceeding, without impacting the remainder of the

discovery schedule. All other deadlines in the current discovery plan will be unaffected by this extension.

**V. Conclusion**

Based upon the current status of the pleadings, the parties request that this Court enter the order submitted with this stipulated motion to extend the deadline for amending pleadings and adding parties until August 22, 2025.

Dated this 22<sup>nd</sup> day of July, 2025.

**GORDON REES SCULLY  
MANSUKHANI, LLP**

By: /s/ Lori N. Brown  
Lori N. Brown  
Attorneys for Defendant Nohayia  
Javed, Esq.

**KUNG & BROWN**

By: /s/ A.J. Kung w/ permission  
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1020 Garces Avenue  
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Counsel for Plaintiff Charm Hospitality LLC dba  
Wingate by Wyndham Elko

**KEMP JONES**

By: /s/ Nathanael Rulis w/ permission  
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Counsel for Defendant West Town Bank &  
Trust

**CERTIFICATE OF SERVICE**

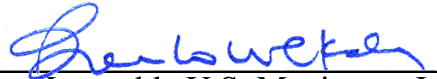
I hereby certify that on July 22, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing thereby transmitting a notice of electronic filing to all counsel and parties of record.

/s/ Lupe Alabado

**ORDER**

The Court having reviewed the Stipulated Motion of the Parties to Extend Deadline for Amending Pleadings and Adding Parties, and good cause appearing, **IT IS HEREBY ORDERED** that the deadline for amending pleadings and adding parties is extended until **August 22, 2025**.

DATED this 23 day of July, 2025.

  
The Honorable U.S. Magistrate Judge